

May 30, 2019

Federal Communications Commission

Submitted via fcc.gov

RE: Comments on Implementation of the National Suicide Hotline Improvement Act WC Docket 18-336 No. 18-336, CC Docket No. 92-105

To whom it may concern,

Equality North Carolina writes today to comment in response to the implementation of the National Suicide Hotline Improvement Act, currently under review by the Federal Communications Commission (FCC). Equality North Carolina works to secure health, safety and equity for lesbian, gay, bisexual, transgender and queer (LGBTQ) North Carolinians.

We appreciate the opportunity to provide comments as FCC issues a formal recommendation on implementing an N11 code for the National Suicide Prevention Lifeline ("NSPL" or "Lifeline"). We are greatly encouraged by Congress's passage of the National Suicide Hotline Improvement Act (P.L. 115-233), and are grateful for FCC's efforts in helping to save lives across the country.

On behalf of Equality North Carolina and our members and supporters, we urge the FCC to recommend the provision of a dedicated N11 code for a suicide prevention and mental health crisis hotline, and not simply add these services to an existing code such as 211 as recommended by the North American Numbering Council. 211 is currently already designated for information and referral services like employment opportunities and utility assistance, not emergent situations like suicide prevention and mental health crisis, which require rapid and tailored response. Combining life-and-death calls with information referral services means that callers in crisis may face delayed access to experienced assistance due to inexperienced call center staff who are unprepared for mental health crisis calls, or interactive voice response that increases wait times.

Equality North Carolina urges the FCC to either designate a currently undesignated N11 code or repurpose a currently designated but low volume N11 code for the sole purpose of a national suicide prevention and mental health hotline. The need for effective national response to suicide is real: the Centers for Disease Control & Prevention reported that the national suicide rate rose 24% between 1999 and 2016. The LGBTQ community is disproportionately impacted, as lesbian, gay, and bisexual youth seriously contemplate suicide at almost three times the rate

Securing equal rights and justice for lesbian, gay, bisexual, transgender, and queer North Carolinians

of heterosexual youth, while 37% of transgender adults reported making a suicide attempt prior to the age of 25.

The National Suicide Hotline Improvement Act creates an important opportunity to significantly reduce the suicide rate in the United States, and we thank the FCC for their commitment to addressing this important issue.

If you have any questions about our comments and recommendations, please contact Ames Simmons at ames@equalitync.org.

Sincerely,

Ames Simmons
Policy Director

Equality North Carolina